

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: BUX DUE, INC. d/b/a The Melting Pot Warrington, Debtor.	Chapter 11 Bankruptcy No. 18-14416
In re: PHILLY DUE, INC. d/b/a The Melting Pot Maple Shade, Debtor.	Chapter 11 Bankruptcy No. 18-14426
In re: MOUNTAIN DUE, LLC d/b/a The Melting Pot Bethlehem, Debtor.	Chapter 11 Bankruptcy No. 18-14420
In re: LV GAUCHO, INC. d/b/a Rodizio Grill Allentown, Debtor.	Chapter 11 Bankruptcy No. 18-14417

**DEBTORS' MOTION FOR AN ORDER
AUTHORIZING JOINT ADMINISTRATION**

Bux Due, Inc. d/b/a The Melting Pot Warrington (the “Bux Debtor”), Philly Due, Inc. d/b/a The Melting Pot Maple Shade (the “Philly Debtor”), Mountain Due, LLC d/b/a The Melting Pot Bethlehem (the “Mountain Debtor”), and LV Gaucho, Inc. d/b/a Rodizio Grill Allentown (the “LV Debtor” and, together with the Bux Debtor, the Philly Debtor, and the Mountain Debtor, the “Debtors”) by and through proposed counsel, Ciardi Ciardi & Astin,

hereby present the Debtors' Motion for an Order Authorizing Joint Administration (the "Motion") and in support thereof respectfully represent:

BACKGROUND

1. On July 2, 2018 (the "Petition Date") the Debtors filed separate, Voluntary Petitions for relief under Chapter 11 of Title 11 of the United States Code, as amended (the "Bankruptcy Code").

2. The above captioned cases have been assigned to the same United States Bankruptcy Judge of the Eastern District of Pennsylvania.

3. The Debtors have continued in possession of their assets and property as Debtors-in-Possession.

4. The Bux Debtor, the Philly Debtor, and the Mountain Debtor are three (3) separate Melting Pot Restaurants where guests can enjoy several fondue cooking styles and a variety of unique entrees, salads, and unforgettable desserts.

5. The LV Debtor is a Brazilian Steakhouse Restaurant located in Allentown, Pennsylvania.

6. The Debtors have the similar ownership structures, similar unsecured creditors, identical secured creditors and cross-collateralization issues, and three of the four Debtors have the same franchise agreement.

RELIEF REQUESTED

7. Federal Rule of Bankruptcy Procedure 1015(b)(4) provides that "[i]f a joint petition or two or more petitions are pending in the same court by ... (4) a debtor and an affiliate, the court may order a joint administration of the estates." Fed. R. Bankr. P. 1015(b)(4).

8. The Debtors submit the joint administration of their bankruptcy cases

places each debtor in a better position to reorganize its financial affairs, file and confirm their respective, feasible Plans of Reorganization and provide a distribution to unsecured creditors of the Debtors' estates.

9. By and through this Motion, the Debtors seek to maintain separate records and tax identities but desire a lead docket number with respect to the above captioned proceeding and the ability to file a Joint Plan of Reorganization should they so choose. The Debtors submit that an order authorizing the Joint Administration of the two (2) bankruptcy cases will enhance the judicial economy and save the Debtors and their respective estates time and money.

10. The Debtors submit that the Joint Administration of these cases should be maintained under the case number assigned to Bux Due, Inc. d/b/a The Melting Pot Warrington, Bankruptcy Case Number 18-14416.

11. As of the filing of this Motion, no trustee, examiner or creditor's committee has been appointed in this Chapter 11 case.

12. No previous request for the relief sought herein has been made to this or any other Court.

WHEREFORE, the Debtors hereby respectfully request that this Court enter an Order, substantially in the form attached hereto, authorizing Joint Administration of the Debtors' bankruptcy cases pursuant to Bankruptcy Rule 1015(a).

Dated: July 2, 2018

CIARDI CIARDI & ASTIN

/s/ Jennifer C. McEntee

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